

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 15-36 Erie
	)	
ELIZABETH McMAHAN	)	

**GOVERNMENT'S OBJECTION TO**  
**DEFENDANT'S MOTION TO TRAVEL**

AND NOW comes the United States of America, by its attorneys, Scott W. Brady, United States Attorney for the Western District of Pennsylvania, and Christian A. Trabold, Assistant United States Attorney for said District, and submits this objection to the defendant's motion to travel:

1. McMahan was indicted by a federal grand jury in Erie, Pennsylvania on November 10, 2015. The indictment charges her with 25 counts of wire fraud in violation of 18 U.S.C. § 1343.

2. McMahan was arraigned on November 16, 2016. She was thereafter released on bond under various conditions of pretrial release.

3. Eighteen (18) motions for extension of time to file pretrial motions have been filed by McMahan in this case.

4. Fifteen (15) motions to travel have been filed by McMahan since her arraignment.

5. As evidenced by the over twenty-nine (29) month delay in this case, and repeated motions to travel, McMahan has demonstrated no interest in resolving her case.

6. The Crime Victims Rights Act of 2004 makes clear that crime victims have the "right to proceedings free from unreasonable delay." 18 U.S.C. § 3771(a)(7). Allowing McMahan to continue to travel around the country with no apparent interest in concluding her case, while the victim has waited more than 29 months for an adjudication of the case, is not in keeping with

either the spirit or the letter of the Crime Victims Rights Act.

Wherefore, the United States respectfully requests that McMahan's motion to travel be denied.

Respectfully submitted,

SCOTT W. BRADY  
United States Attorney

s/ Christian A. Trabold  
CHRISTIAN A. TRABOLD  
Assistant U.S. Attorney  
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